

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

THE UNITED STATES OF AMERICA *

*

VS.

*

CRIMINALNO. C-19-850

*

EDWARD SANCHEZ

*

**DEFENDANT'S RESPONSE TO GOVERNMENT'S MOTION FOR REVIEW OF ORDER OF
RELEASE**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES EDWARD SANCHEZ, the Defendant in the above entitled and numbered cause, by and through Counsel, and would show unto the Court as follows:

The magistrate Judge heard every argument presented in the Government's Motion and ruled that a bond could be set that would secure the Defendant's presence and protect the community. The conditions of the order of release are extremely stringent and adequately address all of the Government's concerns.

Mr. Sanchez faced this very same charge at the state Court when he was arrested on it nearly three years ago. He complied with all of his pre-trial conditions and attended his court dates until the case was dismissed. There is no proof of any criminal conduct since the date of arrest in 2016. The majority of the Government's thirteen page argument is unproven speculation, followed by conclusory statements made based as if those speculations have already been adjudged true. Sanchez has no criminal history, is presumed innocent, has a 17 year work history, has demonstrated he can comply with pre-trial conditions, and has demonstrated he is not a flight risk.

For the last three years the Government has not considered Sanchez to be of such a flight risk or a danger to the community as to charge him or attempt to detain him. Now that he is indicted, he is suddenly a danger. The primary effect of detaining him is to make preparation of his defense more difficult at the point in time when he most needs to prepare and consult with his attorney.

Respectfully Submitted,

s/ JASON WOLF

JASON WOLF

Federal Bar No. 926164

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ATTORNEY FOR DEFENDANT

EDWARD SANCHEZ

CERTIFICATE OF SERVICE

A true copy of the above and foregoing instrument was hand-delivered or mailed, postage prepaid, to Brittany Jensen, Assistant United States Attorney, United States Attorney Office, 800 N. Shoreline Blvd., Suite 500, Corpus Christi, TX 78401, on this 2nd day of July, 2019.

/s/ JASON WOLF

JASON WOLF